

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT  
OF PUERTO RICO**

**IN RE:**

**Case #15-03937(ESL)  
Chapter 11**

**THE HORNED DORSET  
PRIMAVERA INC.  
Debtor in Possession**

\*\*\*\*\*

**SECOND APPLICATION FOR COMPENSATION OF DEBTOR' S  
COUNSEL**

**TO THE HONORABLE COURT;**

**COMES NOW**, Garcia- Arregui & Fullana and very respectfully states and prays:

1. On May 22, 2015 debtor abovementioned filed a petition for relief pursuant to the provisions of section 1101 et seq. of title 11 U.S.C.A.
2. On May 28, 2015 the undersigned filed it application for appointment as counsel for Debtor (Docket #6). The same was approved on June 16, 2015 (Docket # 19)
3. Applicant in the fulfillment of its duties as counsel for debtor , has had numerous conferences with debtor, his accountant as well as counsel for other parties including, PREPA ,AAA, Tourism Company , among others. Counsel has appeared before this Honorable Court at all instances required representing the interest of the Estate and debtor in Possession; such as the initial debtors' interview, the 341 hearing (Docket #33) and the status hearing held on September 22, 2015(Docket 63)., negotiations with Inmobiliaria T & C Inc. regarding the real estate property and Debtor's right of Usufruct. Reply to motion to lift stay filed by Kristin Blomquist (Docket 23)
4. Counsel has met, prepared and discussed with Debtor officers and accountants the final draft of the Disclosure Statement has been filed and scheduled for hearing on May

17, 2016. Also has evaluated the claims filed in order to prepare objection to several of them after consultation with the accountant.

6. Attached hereto and made parte hereof is a statement showing with more detail and particularity of the professional services rendered by applicant extracted from Applicant ' s time records; for the time period of from November 1, 2015 and including March 31, 2016 .

7. Applicant has performed the services which will be set forth in hereto and which services have been performed on an hourly basis, at a the rate of \$250.00 per hour for Isabel M. Fullana admitted to practice before the Supreme Court of Puerto Rico on November 6, 1979, Associates' work is charged on an hourly basis at the rate of \$125.00. Paralegal work is charged on an hourly basis at rate of \$90.00 per hour.

8. The aforesaid rates are considered to be reasonable considering the nature of the case, the work performed and which are similar to the rates charged by applicant to non bankruptcy clients for similar services. The services performed by each professional are identified with their initials

9. A summary of professional time and fees requested in this application is a follows:

	Hours	Rate	Total
Isabel M Fullana	101.50	250.00	25,375.50
Eduardo Capdevila	49.60	125.00	6,200.00

Summary of the time dedicate by matters

Adequate Assurance matters	10.60	\$2,612.50
Application Professionals	4.3	1,075.00
Court Appearances & 341	4.3	912.50
Drafting Disclosure Sta. & Plan	42.20	8,662.50
General matters compiling info	7.50	1,712.50
General matters Debtor's operations	31.10	6,025.00
Legal Research	10.20	2,125.00
Monthly Operation reports	4.0	1,000.00
Review POC/objections	21.4	4,125.00
Tourism Company Claim	10.80	4,645.83
Violation of Automatic Stay	4.7	2,662.50
Total fees	151.10	\$31,575.00

10.. The source of the funds to be paid to Applicant by Debtor if authorized by this Honorable court, shall be from funds available from the operation of Debtor's business affairs and or consigned with the Clerk's Court for such purposes.

10. The case status is the following:

- a. The petition, schedules, SOFA, creditor s lists and matrix (docket 1) all have been prepared and filed within the time periods required.
- b. The IDI information matters and meetings have all bee complied with as application for attorneys, accountants for the debtor have been filed and approved( dockets 6,, 37, 52, 50,58 )
- c. The 341 hearing meeting was completed and closed on July 7 (

Docket 33)

- d. A status report was timely filed September 15, 2015(Docket 60) and a hearing on the same was held on September 22, 2015.
- e. Debtor in Possession filed a Disclosure Statement and Plan on February 24, 2016( Docket 142 & 143)
- f. The amounts of cash and estate assets appear from the MOR filed and the schedules.
- g. All MORS up to the month of February, 2016 (Docket 148) and US trustees fees have been paid and filed as of the date of the present application.

11. Applicant is providing an itemized description of services rendered in chronological order.

12. As set forth the total services performed by Garcia- Arregui & Fullana Law Firm amounts to \$ 31,575.00 and \$ 94.35 for expenses. Counsel received a retainer prior to the filing of the petition in the amount of \$20,000.00 to cover fees and \$1,717.00 to cover filing fees. The retainer amount was applied to first request for compensation approved by the Court per order dated December 7, 2015(Docket 116)

13. There is no agreement on the part of Applicant for the sharing of any of the compensation received or to be received, except customary payments to members, partners and regular associates of the firm.

14. The invoice enclosed was reviewed and approved by the Debtor's officer Mr. Wilhelm Sack.

### **CERTIFICATION**

The undersigned **certifies** under penalty of perjury that he has read the foregoing application subscribed by him, and to the best of his knowledge and belief formed after reasonable inquiry the compensation and expense reimbursement sought conform to the United States Bankruptcy Court for the District of Puerto Rico's Guideline for Compensation and Expense Reimbursement for Professional the fee for services is billed in accordance with the practice no less favorable to the Debtor than those customary utilized by Applicant generally.

### **NOTICE**

Unless an objection to the Application is filed **within twenty one (21) days** from service of this notice, after service as evidenced by the certification, and an additional three days (3) pursuant to Fed. R Bank P 9006(f) **if you were served by mail**, any party against whom this application has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this motion with the Clerk's office of the US Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed **within the time allowed herein**, the motion will be deemed unopposed and may be granted unless (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**WHEREFORE**, it is respectfully prayed that an order be entered approving the present First application for compensation as counsel for Debtor in Possession in the amount of \$ 31,575.00, plus \$ 94.35 for expenses and for any other and further relief as it may seem just and proper.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 12<sup>th</sup> day of April 2016.

**I HEREBY CERTIFY** that on this same date I electronically filed the foregoing with the Clerk of the Bankruptcy Court using CM/ECF system which will send electronic notification to the following, the US trustee 's office and to any other party in interest that has requested notice.

S/ ISABEL M FULLANA  
GARCIA-ARREGUI &FULLANA  
252Ponce de Leon Ave Suite  
1101 Citibank Tower San Juan,  
PR 00918 TEL 787-766-2530  
FAX 787-756-7800  
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**GARCIA-ARREGUI & FULLANA LAW OFFICES**

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Mr. Wilhelm Sack  
The Horned Dorset Primavera Inc  
Rincon PR 00677

April 06, 2016

Invoice 11047  
#

Professional Services

ADEQUATE ASSURANCE ISSUES

	<u>Hrs/Rate</u>	<u>Amount</u>
11/4/2015 Receipt new of counter offer from PREPA. Copy to client.	0.60 250.00/hr	150.00
11/18/2015 Receipt, review and lodging; letter form Lic Cintron, Reply to Lic Cintron. Email to client RE: payment of deposit.	0.60 250.00/hr	150.00
Several email concerning a letter hand delivered to debtor concerning the 10,000 payment and stipulations.	0.70 250.00/hr	175.00
11/20/2015 Several emails from client, RE: stipulation with PREPA.	0.60 250.00/hr	150.00
Receipt, review and lodging of draft of stipulation for adequate assurance payments. Email to client.	0.70 250.00/hr	175.00
11/23/2015 phone call with PREPA legal of trial and bankruptcy as to the payment method. Reply to client and explained process.	0.60 250.00/hr	150.00
11/24/2015 Received email, copy of check. Review final draft of stipulation and filing.	0.80 250.00/hr	200.00
Email to Lic. Cintron PREPA. Copy of check and filed motion.	0.60 250.00/hr	150.00
12/16/2015 Email from client as to payment of adequate assurance, reply to same.	0.60 250.00/hr	150.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2015 Reply to clients email concerning payment of \$5,000.00 to PREPA adequate assurance	0.60 250.00/hr	150.00
1/11/2016 Receipt, review and lodging of email concerning letter from AEE. Phone conference with Bennazar, RE: claim 10 and tourism.	0.60 250.00/hr	150.00
Email to Zenaida RE: Payment of deposit to AEE. Reply to same, discussing as to letter to Lic Cintron AEE.	0.80 250.00/hr	200.00
2/11/2016 Email - cut off service AAA. Reply to same.	0.60 250.00/hr	150.00
3/1/2016 Email exchange with Atty. Fullana, Atty. Cintron, and client. Re: payment of adequate assurance to PREPA	0.30 125.00/hr	37.50
3/21/2016 Email to Debtor, RE: payments to AEE/Bond Payments.	0.60 250.00/hr	150.00
3/29/2016 Phone call with Mr. Sack, pending matters/AEE.	0.60 250.00/hr	150.00
Email to Lic. Cintron, RE: payments to AEE.	0.70 250.00/hr	175.00
SUBTOTAL:	[ 10.60	2,612.50]
<u>APPLICATION FROFESIONALS</u>		
11/12/2015 Prepare draft application compensation AJB email to Yuan.	1.50 250.00/hr	375.00
11/16/2015 Review and filing applications for compensation of special counsel. Draft notice to creditors.	1.00 250.00/hr	250.00
11/18/2015 Receipt, review and lodging of application for compensation, accountant.	0.60 250.00/hr	150.00
12/4/2015 Drafting motion no objection to fees.	0.60 250.00/hr	150.00
12/14/2015 Receipt, review and lodging of application for compensation special counsel and accountant. Email copy of order.	0.60 250.00/hr	150.00
SUBTOTAL:	[ 4.30	1,075.00]
<u>COURT APPEARANCES/IDI/341</u>		
12/29/2015 phone call to case manager, RE: rescheduling of Hearing.	0.30 125.00/hr	37.50



	<u>Hrs/Rate</u>	<u>Amount</u>
2/22/2016 prepare for hearing with Atty. Fullana.	1.00 125.00/hr	125.00
2/23/2016 Court Appearance several motions	3.00 250.00/hr	750.00
SUBTOTAL:	[ 4.30	912.50]
<u>Drafting Disclosure Statement and Plan</u>		
12/21/2015 Continuance draft, disclosure statement and plan.	2.00 250.00/hr	500.00
12/22/2015 Disclosure statement.	2.50 250.00/hr	625.00
1/18/2016 Meeting with Atty. Fullana to prepare for conference with client and CPA.	1.00 125.00/hr	125.00
1/19/2016 Meeting with CPA, Mr.Sack and Atty. Bennazar.	3.50 125.00/hr	437.50
2/8/2016 Draft email to CPA, RE: financial information and liquidation analysis.	0.60 250.00/hr	150.00
Receipt, review and lodging of email from CPA Rivera, information for D.S. and Plan reply.	0.60 250.00/hr	150.00
2/9/2016 Drafting final disclosure plan, classification of claims.	2.00 250.00/hr	500.00
phone conference with Pedro Rivera, plan information and payment plan to terms.	0.60 250.00/hr	150.00
2/10/2016 Receipt email CPA Rivera, confirmation assets. Reply.	0.60 250.00/hr	150.00
Receipt - projection as to payment plan, email to CPA Rivera.	1.50 250.00/hr	375.00
phone call to CPA Rivera.	0.60 250.00/hr	150.00
2/11/2016 Draft final version plan of reorganization.	1.00 250.00/hr	250.00
2/12/2016 Receipt, review and lodging of amended projections and plan reorganization.	2.00 250.00/hr	500.00
Drafting plan of reorganization.	1.50 250.00/hr	375.00

	<u>Hrs/Rate</u>	<u>Amount</u>
2/12/2016 phone call to Rivera/Protections 50% to unsecured claim. IVU, tourism / withdrawing taxes. Estado Financieros.	0.60 250.00/hr	150.00
2/16/2016 Disclosure Statement.	1.00 250.00/hr	250.00
2/17/2016 Continuation Disclosure Statement Plan/Treatment to creditors.	3.00 250.00/hr	750.00
2/18/2016 Correction to final draft D.S., verification amounts prepared by accountant.	2.00 250.00/hr	500.00
2/19/2016 Final draft, Plan and Disclosure statement.	3.00 250.00/hr	750.00
2/22/2016 Draft final plan of reorganization.	1.00 250.00/hr	250.00
Amendment D.S. Analyzed the D.S. to remove.	4.40 125.00/hr	550.00
2/24/2016 Amendment D.S.	2.50 125.00/hr	312.50
Amendment Plan of Reorganization.	3.50 125.00/hr	437.50
Review to final draft plan.	1.00 250.00/hr	250.00
3/1/2016 Analysis of court order. Re: DS and Plan	0.20 125.00/hr	25.00
<b>SUBTOTAL:</b>	[ 42.20	8,662.50]
<b><u>GENERAL MATTER/COMPILING INFORMATION</u></b>		
12/4/2015 phone conference to CPA Rivera offices. RE: pending information.	0.60 250.00/hr	150.00
Email to accountant, RE: financial information, objection to claims.	0.60 250.00/hr	150.00
12/29/2015 Receipt, review and lodging of information concerning room 10.	0.80 250.00/hr	200.00
1/14/2016 Review deeds of Propiedad Horizontal and others.	1.00 250.00/hr	250.00
Status and review of documents/deeds of save and Propiedad Horizontal.	0.80 250.00/hr	200.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2016 Meeting to discuss matter to be included for discussion tomorrows conference with client.	1.00 250.00/hr	250.00
1/27/2016 Receipt, review and lodging of information from Blue Mango.	0.60 250.00/hr	150.00
1/29/2016 Receipt, review and lodging of documents concerning deed in residences.	0.80 250.00/hr	200.00
3/1/2016 Receiving email from client. Re: Minutes of hearing of contempt proceeding and lifting of stay.	0.30 125.00/hr	37.50
3/9/2016 Receiving email or memo from Easy check company. Re: payroll withholdings of Debtor and documental evidence of such.	0.40 125.00/hr	50.00
Analysis of documental evidence submitted by Easy check. Re: payroll withholdings	0.60 125.00/hr	75.00
SUBTOTAL:	[ 7.50	1,712.50]
<u>GENERAL MATTERS DEBTOR OPERATIONS</u>		
11/3/2015 Receipt, review and lodging email, RE: investor inspection of facilities for Nov 4/15	0.30 250.00/hr	75.00
11/6/2015 Letter to client Bechara proposal, reply for AJB	250.00/hr	NO CHARGE
11/12/2015 email document/ memo received from potential interested party.	0.30 250.00/hr	75.00
11/16/2015 phone conference to Lic Wally de la Rosa, RE: Fondo del Seguro del Estado.	0.60 250.00/hr	150.00
11/18/2015 Receipt, review and lodging, copy of letter tendered personally.	0.60 250.00/hr	150.00
11/30/2015 Receipt, review and lodging of court order.	0.10 125.00/hr	12.50
12/3/2015 Receipt, review and lodging of email from Sack-Ex directors, Reply to same.	0.60 250.00/hr	150.00
12/7/2015 drafting and sending email or memo to client RE: operation of restaurant from 2009 up to 2015. We prepare information, Reply form client.	0.60 250.00/hr	150.00
12/9/2015 Email from William, RE: villa 10 claim. Reply to same.	0.80 250.00/hr	200.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/24/2015	Meeting and discussion with Atty. Fullana as to possible settlement of choice claim.	0.40 125.00/hr	50.00
	Drafted email to client, RE: choice cable issue of claim 10.	1.80 125.00/hr	225.00
	Receipt, review and lodging of email from client, RE: choice cable.	0.10 125.00/hr	12.50
12/29/2015	Receipt, review and lodging of calendar rescheduling order to show case for 1/26/2016.	0.30 250.00/hr	75.00
	Receipt, review and lodging of order from court.	0.20 125.00/hr	25.00
1/11/2016	Memo requesting meeting.	0.60 250.00/hr	150.00
1/20/2016	Review and analyzed documents and all communication between Mr. Sack and Mr. Domenech since 2009 though 2014.	3.90 125.00/hr	487.50
1/21/2016	Reply to Mr. Sack email regarding letter addressed to Lic Soto Vega.	0.80 250.00/hr	200.00
	Letter to Lic Soto Vega.	0.60 250.00/hr	150.00
1/22/2016	Email from Lic Bennazar as to the IVU from Blue Mango.	0.60 250.00/hr	150.00
1/27/2016	Review and analyzed documents related to IVU claim form Blue Mango.	1.00 125.00/hr	125.00
2/1/2016	Phone conference, RE: Poliza del Fondo del Seguro del Estado.	0.60 250.00/hr	150.00
2/3/2016	phone conference with Lic. Lopez as to problem with electronic payment account.	0.60 250.00/hr	150.00
	Receipt, review and lodging of email from client as to the closing of the account. Drafting email to Ms. Guzman, RE: electronic account, new member.	1.00 250.00/hr	250.00
	Receiving email or memo from Lic. Lopez as to person in charge of documenting new account information.	0.60 250.00/hr	150.00
	Receipt email from Lic Lopez, RE: problem with the electronic system that HDP should contact directly Ms. Guzman.	0.60 250.00/hr	150.00
2/11/2016	Review matter for hearing 2/23/2016.	1.00 250.00/hr	250.00



	<u>Hrs/Rate</u>	<u>Amount</u>
2/22/2016 phone call to Lic Bennazar, RE; citation.	0.60 250.00/hr	150.00
Conference with Wilhem Sack - RE; citations recalled no description as to grounds.	0.80 250.00/hr	200.00
Meeting with Atty. Fullana as to possible consequences to debtor that the citation to Mr. Sack may have and discussion as to strategy.	1.00 125.00/hr	125.00
Review and analyzed court citation of general manager; and discussion with Atty. Fullana.	0.50 125.00/hr	62.50
2/23/2016 Reply to email from Sack. RE; investigation.	0.60 250.00/hr	150.00
Email to Bennazar, RE; reunion 2/3/2016	0.60 250.00/hr	150.00
2/24/2016 Phone conference with Zenaida, RE; Planillas emplaces / Registered / Acuerdo	0.60 250.00/hr	150.00
Email to Lizzie, easy check RE; payment PRADI and filed.	0.60 250.00/hr	150.00
Phone conference with Juan Bruno, front desk manager report. Detailed todos los conceptos de ingreso. 2000-> food & beverage	0.60 250.00/hr	150.00
2/29/2016 Meeting with Atty. Matos at San Juan court, RE: criminal charges of Mr. Sack.	3.50 125.00/hr	437.50
phone conference Bennazar/Capdevila, hearing to consider felony charges against.	0.80 250.00/hr	200.00
Meeting with Atty. Fullana regarding criminal charges against Debtor.	0.80 125.00/hr	100.00
3/2/2016 Conference with Eduardo Capdevila.	0.80 250.00/hr	200.00
Receiving email or memo from Mr. Sack. Re: Impact of charges to Hotel, and press coverage.	0.30 125.00/hr	37.50
3/11/2016 Review and analyzed documents sent by Atty. Matos.	0.40 125.00/hr	50.00
<b>SUBTOTAL:</b>	[ 31.10	6,025.00]

		<u>Hrs/Rate</u>	<u>Amount</u>
<u>LEGAL RESEARCH</u>			
12/23/2015	Legal Research of case law cited by claim 10; shepadizel cost and review then to distinguish them form case at hand.	0.90 125.00/hr	112.50
12/30/2015	Legal Research of Turismo claim and merits of there claim pursuant to state law.	2.50 125.00/hr	312.50
1/20/2016	Legal Research as to 507(a)(8).	1.00 250.00/hr	250.00
2/15/2016	Legal Research state taxes/penalties not a priority, case of In re Aritel Inc.	1.50 250.00/hr	375.00
2/20/2016	Legal Research, RE; order to show cause, Domenech inapplicability of exemption.	2.80 250.00/hr	700.00
2/22/2016	Legal Research, continuance. Cir 1 cases 362(6)(3) & 362(4)exception.	1.50 250.00/hr	375.00
SUBTOTAL:		[ 10.20	2,125.00]
<u>MONHTLY OPERATION REPORTS</u>			
11/20/2015	Receipt, review and lodging MOR for October.	0.60 250.00/hr	150.00
12/18/2015	Receipt, review and lodging of MOR October, from CPA Rivera, Review and filing.	0.80 250.00/hr	200.00
1/21/2016	Receipt, review and lodging of MOR December 2015.	0.60 250.00/hr	150.00
2/23/2016	Phone conference with CPA Rivera, RE; report of operations.	0.60 250.00/hr	150.00
2/25/2016	Receipt, review and lodging of MOR January.	0.60 250.00/hr	150.00
3/22/2016	Receipt, review and lodging of MOR February 2016.	0.80 250.00/hr	200.00
SUBTOTAL:		[ 4.00	1,000.00]
<u>REVIEW POC/OBJECTIONS</u>			
11/16/2015	phone conference with Lic Bennazar and CPA Rincon. RE: proof of claim filed by Hacienda, IVU taxes.	0.60 250.00/hr	150.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/16/2015	phone conference with accountant, RE: pending analysis of information regarding tourism claim and Mr. Domenech	0.60 250.00/hr	150.00
	Receipt, review and lodging of POC claims files by Hacienda, IVU & retention de employees.	0.60 250.00/hr	150.00
	Review and analyzed proof of claim 17 filed by Hacienda.	0.70 125.00/hr	87.50
12/4/2015	phone call to CPA, status of analysis of issues tourism, Domenech & IVU.	0.60 250.00/hr	150.00
12/9/2015	Conference with CPA Rivera, RE: objections to claims IVU/Hacienda y Villa 10	0.80 250.00/hr	200.00
12/16/2015	Analysis of expert report prepared for proof of Hacienda.	0.40 125.00/hr	50.00
	Initial drafting disclosure, review of several proof of claim.- filed by governmental entities.	1.50 250.00/hr	375.00
	Reply to email form CPA Rivera, Email sending claims Dept. Labor and IRS for evaluation.	0.60 250.00/hr	150.00
1/12/2016	Several email from Sack as to pending matter, reports and IRS claim.	0.60 250.00/hr	150.00
1/19/2016	Meeting with CPA Rivera, Lic Bennazar, debtor officer Wilhem Sack. RE: objection to claims - IVU/Hacienda, Domenech.	2.50 250.00/hr	625.00
1/26/2016	Several emails from Lic Bennazar and Sack regarding Blue Mango & IVU.	0.60 250.00/hr	150.00
	Draft correspondence to Lic. Rodriguez (Hacienda). RE: Objection to POC. IVU	1.00 250.00/hr	250.00
	Review and analyzed statement of expenses of Villa 10.	1.30 125.00/hr	162.50
2/1/2016	Review and analyzed amended POC-17 from Hacienda.	0.40 125.00/hr	50.00
2/15/2016	Review of balances owed per CPA analysis and in view of decision concerning surcharges.	1.00 250.00/hr	250.00
	phone conference with Lic Bennazar, status of information concerning payment to Hacienda.	0.60 250.00/hr	150.00
2/19/2016	Review and analyzed expert report on Turismo claim and discussion with Atty. Fullana of report.	1.00 125.00/hr	125.00

	<u>Hrs/Rate</u>	<u>Amount</u>
2/19/2016 Corrected drafting objection to claim 4 filed by Turismo.	2.90 125.00/hr	362.50
Drafted objection to Hacienda claim.	2.80 125.00/hr	350.00
3/2/2016 Email to Atty. Lopez of Tourism Co. Re: meeting	0.30 125.00/hr	37.50
SUBTOTAL:	[ 21.40	4,125.00]
<u>TOURISM CLAIM</u>		
12/21/2015 Receipt, review and lodging of analysis of debt owed to tourism.	1.00 250.00/hr	250.00
12/29/2015 Receipt, review and lodging of email from Lic. Lopez (tourism) status of claim.	0.60 250.00/hr	150.00
1/25/2016 Email to Lic Lopez, RE: cancellation of electronic terminal for tax payment, Receipt reply to same.	0.60 250.00/hr	150.00
1/27/2016 Email to Lic Giselle Lopez RE: information / contact phone Ms. Guzman.	0.60 250.00/hr	150.00
Email to Lic Lopez RE: Status of the closing of the account electronic.	0.70 250.00/hr	175.00
2/2/2016 Receipt, review and lodging of email RE: fax account tourism, forward to Lic. Lopez.	0.60 250.00/hr	150.00
2/25/2016 Receipt, review and lodging of confirmation of meeting at Tourism. Copy to Lic Bennazar.	0.60 250.00/hr	150.00
2/29/2016 Phone call with Atty. Matos, RE: meeting with Turismo.	0.30 125.00/hr	37.50
3/2/2016 Meeting at Tourism - RE: payment plan, conference with Lic. Bennazar.	2.00 250.00/hr	500.00
3/3/2016 Phone conference with Pedro Rivera, RE: analysis of the debt owed to tourism.	0.60 250.00/hr	150.00
Meeting with Lic. Law and Lic Matos, criminal aspect in the case.	2.00 250.00/hr	500.00
3/7/2016 Receipt, review and lodging of certification from Tourism, RE: Room tax, Email to client.	0.60 250.00/hr	150.00
3/15/2016 Email as to payment tourism.	0.60 250.00/hr	150.00



	<u>Hrs/Rate</u>	<u>Amount</u>
SUBTOTAL:	[ 10.80	2,662.50]
<u>VIOLATION OF AUTOMATIC PROVISIONS</u>		
11/9/2015 Receipt, review and lodging. Order sent consideration of motion for reconsideration for 1/26/2016	0.60 250.00/hr	150.00
12/23/2015 Review and analyzed response motion filed by claim 10.	1.00 125.00/hr	125.00
12/29/2015 Drafted motion for Leave to Reply.	0.40 125.00/hr	50.00
Filing of motion for leave.	0.20 125.00/hr	25.00
Email to Zenaida, RE: report of room 10.	0.20 125.00/hr	25.00
12/30/2015 Worked on reply motion.	2.30 125.00/hr	287.50
SUBTOTAL:	[ 4.70	662.50]
For professional services rendered	151.10	\$31,575.00
Additional Charges :		
11/2/2015 Postage: Carta al Sr. Pedro J. Rivera CPA		0.50
Carta al Sr. Pedro Rivera - CPA		0.40
11/3/2015 Email del 14/Oct/15		0.20
Agreement to provide food and beverage catering services in Rincon, this 29 of October, 2015 - Chef Juan M. Seoave.		0.50
11/4/2015 Motion requesting modification of adequate assurance requested by PRASA . Doc 16 06/11/2015		0.20
11/9/2015 charges for use of pacer system		24.30
11/12/2015 Doc 11 filed 06/02/15 - Notice of appearance and request for sentence.		0.10
Postage: Notice and certificate of mailing.		9.00
Notice and certificate of mailing.		1.90

	<u>Amount</u>
11/17/2015 Order and notice rescheduling - Doc 104 - Filed 11/17/15	0.10
11/23/2015 Postage: Notificación de vista.	0.50
Proof of claim - Dept. Hacienda claim 17 - filed 11/16/15	1.20
11/24/2015 Postage: Stipulation - Doc 112 filed 11/24/15	9.00
Stipulation - Doc 112 - Filed 11/24/15	3.90
11/25/2015 Application for appointment of special attorney for the estate (Bennazar) - Doc 50 - filed 08/10/15	1.00
12/1/2015 Postage: motion as to assumption executory contract - doc 92 - filed 10/30/15	12.75
12/7/2015 Order - Doc 116 filed 12/02/15	0.10
12/15/2015 Doc 120 filed 12/14/2015 - Order	0.10
12/24/2015 Claim register del 12/16/2015	0.70
Memorandum del 10/12/2016	0.20
1/13/2016 Esc. 34, Individualización, liberación y compraventa - unidad 10 - Francisco Domenech.	2.00
Email to Lcdo Jose R. Cintrón Rodriguez de AEE.	0.10
1/14/2016 Postage: Statement 1119	0.50
Email del 11 y 12 - enero del 2016.	0.40
1/18/2016 Proof of claim - Hacienda claim 17-1 y 16-1 -- filed 11/16/2015	1.90
1/20/2016 Turismo - Research.	5.80
1/21/2016 Carta al Lcdo. Rafael Soto Vega.	0.50
1/26/2016 Postage: Carta al Lcdo. Rafael Soto Vega.	0.50
2/10/2016 Memorandum a CPA Pedro Rivera del 1/29/16	0.10
2/19/2016 Copia cheque de \$350,000.00 a Hacienda, Estado de venta de Western Bank, acuerdo final a término con el codigo de Rentas Internas.	0.90
2/23/2016 Research para la vista del 2/23/16.	6.80
2/26/2016 Independent auditors report - del 2 de marzo de 2009	0.90
Copia de cheque de \$350,000.00. Estado de cuenta de Western bank. Acuerdo final a tenor al codigo de Rentas Internas.	0.90

	<u>Amount</u>
2/26/2016 Liquidation analysis as of February 22, 2016.	1.90
3/3/2016 Copia Esc-6, Hipoteca del 16 de julio 2004	3.50
3/10/2016 Postage:RE: swisher - correspondence devuelta por tribunal.	0.70
email del 7 de marzo	0.20
Certificacion de Deuda, despues de Quiebras (Turismo)	0.10
 SUBTOTAL:	 <u>94.35</u>

GENERAL MATTERS DEBTOR OPERATIONS

1/28/2016 Planillas de IVU Blue Mango Corp.	23.10
 SUBTOTAL:	 <u>23.10</u>
Total costs	<u>\$117.45</u>
Total amount of this bill	<u>\$31,692.45</u>

